

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LOUISE ROGERS TATE,

Plaintiff

-against-

NALA GHOSH, MICHAEL COHEN, MOHD D.  
FARUGUE, ARISTISIDIS SHISMEROS, WAI KWOK HA,  
GOLAM MURTUJA, FRED WEINGARTEN and  
HILTON HOTELS CORPORATION,

Defendants  
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Index No.: 07-CV-5885

**DISCLOSURE RESPONSES**

**C O U N S E L :**

Defendant, KWOK WAI HA s/h/a WAI KWOK HA, by his attorneys, PHILIP J.

RIZZUTO, P.C., provides the following disclosure to all parties:

1. Besides all parties herein, defendant is aware of two witnesses to the within occurrence, to wit: Jennifer Mitchell, 357 Pleasant Valley Road, Norwood, New York and Jeffrey Brink, 33 East 78<sup>th</sup> Street, New York, New York.
2. Enclosed herein, please find defendant HA's insurance declaration page indicating insurance limits applicable for the within accident.
3. At this time, defendant is not in possession of any accident reports other than the Police Accident Report which is a matter of public record.
4. At this time, defendant is not in possession of any photographs depicting any of the vehicles involved in the within accident or the accident location.

PLEASE TAKE NOTICE, that defendant HA reserves the right to supplement this response prior to the trial of the within action.

Dated: Carle Place, New York  
October 24, 2007

Yours, etc.,

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Our File No. 62-0087

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